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Attorneys for Defendants

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

RYAN BARTLETT, an individual,

Plaintiff,

v.

FIRST STUDENT, INC., a Delaware  
corporation, and CLARENCE D. HAWS, an  
individual,

Defendants.

Case No.: \_\_\_\_\_

**NOTICE OF REMOVAL TO FEDERAL  
COURT**

**DEMAND FOR JURY TRIAL**

**TO: CLERK OF THE COURT**

PLEASE TAKE NOTICE THAT defendants First Student, Inc., and Clarence D.  
Haws (“Defendants”) hereby remove to this Court the state action described below:

1. On or about October 29, 2020, an action was filed in the Circuit Court of the  
state of Oregon for the county of Multnomah entitled *Ryan Bartlett, an Individual vs. First*

*Student, Inc., a Delaware corporation, and Clarence D. Haws, an individual*, case number 20CV38368. True and correct copies of the summonses and complaint are attached hereto as **Exhibit 1**.

2. This action is a civil action over which this Court has original jurisdiction pursuant to 28 USC §1332, and is one that may be removed to this Court by Defendants pursuant to 28 USC §1441(b) because:

a. At all relevant times, upon information and belief plaintiff Ryan Bartlett's state of residence is Oregon. The complaint does not allege where she is a resident.

b. At all relevant times, defendant Clarence D. Haws was and is a resident of the state of Washington.

c. At all relevant times, defendant First Student, Inc., was and is a business incorporated in the state of Ohio.

d. Plaintiff seeks \$920,000 in damages.

3. Removal is timely pursuant to 28 USC §1446(b) because the complaint was served on defendant First Student, Inc. on November 9, 2020.

4. All defendants have consented to filing the removal.

5. This is the district and division embracing the place where the state court action is pending (Multnomah County Circuit Court).

6. No other proceedings have occurred, and no other documents have been served in the state court action other than the service of summonses and complaint, as referenced above. A copy of the docket in the state court action is attached as **Exhibit 2**.

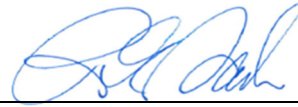
7. In filing this notice, Defendants do not waive any defenses or claims including, but not limited to, any defenses based on jurisdiction, service or statute of limitations.

8. Defendants hereby Demand a Jury Trial.

DATED: November 11, 2020

BULLIVANT HOUSER BAILEY PC

By



**Robert E. Barton, OSB #814637**

Telephone: 503.228.6351

Attorneys for Defendants

4818-4130-8112.1 29213/00145

**CERTIFICATE OF SERVICE**

I hereby certify that on the 11th day of November 2020, I caused to be served the foregoing NOTICE OF REMOVAL TO FEDERAL COURT on the following party at the following address:

Jason Kafoury  
Kafoury & McDougal  
411 SW Second Ave., Ste. 200  
Portland, OR 97204  
Fax No.: (503) 224-2673  
Email: [jkafoury@kafourymcdougal.com](mailto:jkafoury@kafourymcdougal.com)  
*Of Attorneys for Plaintiff*

by:

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | U.S. Postal Service, ordinary first-class mail                              |
| <input type="checkbox"/>            | U.S. Postal Service, certified or registered mail, return receipt requested |
| <input type="checkbox"/>            | Hand Delivery   |
| <input checked="" type="checkbox"/> | E-Service   |
| <input checked="" type="checkbox"/> | Other (specify) <u>Email</u>  |



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Robert E. Barton, OSB #814637

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